

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)
ECF Case

This document relates to:

Moody-Theinert, et al. v. Islamic Republic of Iran (1:18-CV-11876) (GBD) (SN)

**THE MOODY-THEINERT PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL FINAL JUDGMENT AGAINST THE ISLAMIC REPUBLIC OF IRAN AS TO
LIABILITY AND DAMAGES**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and Declaration of Jerry S. Goldman, Esq., (“Goldman Declaration”), along with the exhibits appended, plaintiffs in the above-referenced matter, by and through their counsel, Anderson Kill P.C., respectfully move this Court for an Order of judgment by default as to liability against the Islamic Republic of Iran (“Iran”) as to all *Moody-Theinert* Plaintiffs’ claims under Section 1605A(c) of the FSIA.

Further, those *Moody-Theinert* plaintiffs identified on Exhibit A to the Goldman Declaration respectfully move this Court for an Order awarding: (1) judgment as to damages on behalf of the Plaintiffs identified on Exhibit A only in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs in *Burnett, Havlish, Ashton, Bauer*, and other cases; (2) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001, until the date of the judgment for damages; (3) permission for such plaintiffs to seek punitive damages and economic and other appropriate damages at a later date; and (4) for all other plaintiffs in this action not appearing on Exhibit A to

submit applications for damages awards in later stages, to the extent such awards have not previously been addressed.

Respectfully submitted,

ANDERSON KILL P.C.

Jerry S. Goldman, Esq.

Bruce E. Strong, Esq.

Jeffrey E. Glen, Esq.

Vianny M. Pichardo, Esq.

1251 Avenue of the Americas

New York, NY 10020

Tel: 212-278-1000

Fax: 212-278-1733

Email: jgoldman@andersonkill.com

bstrong@andersonkill.com

jglen@andersonkill.com

vpichardo@andersonkill.com

Arthur R. Armstrong, Esq.

(*pro hac vice*)

1760 Market Street, Suite 600

Philadelphia, PA 19103

Tel: 267-216-2711

Fax: 215-568-4573

Email: aarmstrong@andersonkill.com

Attorneys for Plaintiffs

Dated: August 14, 2019
New York, New York